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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

Heather Laboriante

Plaintiff,

v.

Trans Union, LLC and Clarity Services, Inc.,

Defendants.

Case No.: 2:23-cv-00747-APG-VCF

**Unopposed Motion for Extension of  
Time for Clarity Services, Inc. to Answer  
(First Request)**

Heather Laboriante (“Plaintiff”), hereby files this Unopposed Motion for Extension of Time for Clarity Services, Inc. to Answer (“Motion”) and in support states:

1. On May 16, 2023, Clarity Services, Inc. (“Clarity”) was served with Plaintiff’s Complaint for Damages under the FCRA, 15 U.S.C. § 1681 (“Complaint”).
2. Accordingly, Clarity’s responsive pleading to the Complaint is due on June 6, 2023.
3. Plaintiff and Clarity are actively engaged in case-resolution negotiations.
4. Plaintiff does not oppose an extension of Clarity’s time to respond to the Complaint so that the parties may devote their energies to resolving this matter, and respectfully requests the Court for an extension of time for Clarity to file its responsive pleading by 30 days, which is up to and including **July 6, 2023**.
5. This motion is filed in good faith and not for delay.
6. This is the first request for an extension of time for Clarity to answer the complaint and the requested extension does not prejudice the parties.

1 7. For the foregoing reasons, Plaintiff requests that the Court issue an order extending the date  
2 by which Clarity must answer or otherwise respond to Plaintiff's Complaint to **July 6, 2023**.

3 DATED June 6, 2023.

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**FREEDOM LAW FIRM**

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/s/ Gerardo Avalos

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George Haines, Esq.

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Gerardo Avalos, Esq.

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8985 S. Eastern Ave., Suite 100

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*Counsel for Plaintiff*

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**GOOD CAUSE SHOWN, IT IS SO ORDERED.**

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Dated 6-15-2023

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UNITED STATES MAGISTRATE JUDGE

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